

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CIVIL ACTION NO.: 1:21-CV-00059

Rachel Howald,

Plaintiff,

vs.

Ben Lippen School, an assumed business  
name for Columbia International University  
(formerly known as Columbia Bible  
College), and Pamela Kaye Herrington,

Defendants.

**DEFENDANT BEN LIPPEN SCHOOL'S**  
**MOTION TO TRANSFER VENUE**

Defendant Ben Lippen School, which operates as a ministry and institution of Columbia International University (“CIU”) (collectively “Defendant BLS”), by and through its undersigned counsel, hereby moves this Honorable Court to transfer venue of this action to the United States District Court for the District of South Carolina, Columbia Division pursuant to 28 U.S.C. § 1404(a), as the convenience of the parties and witnesses and the interest of justice support a transfer of this matter to the United States District Court for the District of South Carolina, Columbia Division. For these reasons and those fully outlined in the contemporaneously filed Memorandum in Support of Defendant BLS’ Motion to Transfer and attached Affidavit, Defendant BLS respectfully requests that the Court transfer venue of this action to the United States District Court for the District of South Carolina, Columbia Division.

To the extent the Court determines this is a non-dispositive motion, Defendant BLS conferred with Plaintiff, pursuant to Local Civil Rule 7.1(b), and Plaintiff does not consent to Defendant BLS’ Motion to Transfer.

TURNER PADGET GRAHAM & LANEY, PA

s/Hannah D. Stetson

Hannah D. Stetson (N.C. Bar # 44826)

hstetson@turnerpadget.com

Turner Padget Graham & Laney P.A.

Post Office Box 1473

Columbia, South Carolina 29202

Phone: 803-254-2200

Fax: 803-400-1515

March 31, 2021

**ATTORNEYS FOR DEFENDANT BLS**

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES that, on March 31, 2021, the undersigned filed the foregoing **MOTION TO TRANSFER VENUE** in the above-referenced matter and it was filed electronically with the clerk of court using the CM/ECF system with notice of case activity to be generated and sent electronically by the clerk of court to the following parties registered to receive such service:

Jonathan S. Shbeeb, Esquire  
John B. Riordan, Esquire  
Fidelity Law Group, PLLC  
8511 Davis Lake Parkway, Suite C6-138  
Charlotte, NC 28269  
Telephone: 704-285-8111

Basyle Tchividjian, Esquire  
Landis Graham French  
145 E. Rich Avenue, Suite C  
Deland, FL 32724  
Telephone: 386-734-3451  
*Appearing Pro Hac Vice*

Peter Janci, Esquire  
Crewjanci, LLP  
1200 NW Naito Parkway, Suite 500,  
Portland, Oregon 97209  
*Appearing Pro Hac Vice*

and served the same to the Defendant Pamela Kaye Herrington, by placing a copy in the United States Mail, with due and proper postage affixed thereto as addressed below:

Pamela Kaye Herrington  
c/o Bill Trosch, Esquire  
Michael S. Todd, Esquire  
Conrad Trosch & Kemmy, PA  
301 S. McDowell Street, Suite 1001  
Charlotte, NC 28204

s/Hannah D. Stetson  
Hannah D. Stetson, NC Bar No. 44826  
Turner Padget Graham & Laney P.A.  
Post Office Box 1473  
Columbia, South Carolina 29202  
(803) 254-2200 (Telephone)  
hstetson@turnerpadget.com  
**ATTORNEYS FOR DEFENDANT BLS**

March 31, 2021